

Exhibit A

From: James Chapman <jchapman@cwm-law.com>
Sent: Thursday, July 10, 2025 4:01 PM
To: Rodgers, James
Cc: Roman, Michael; Johnson, Dawn; Murphy, Siobhan; Werner, Rachel; Cohen, Harry; Zach Jett; Mark Nanavati; Christopher Jones; W. Ryan Snow; Mackenzie Pensyl; Tressa Lucas; Nikki Ramshur; Breanna Morgan
Subject: Inspection of Tug Mackenzie Rose
Attachments: 2025-04-30 NPBL Requests for Inspection of MT Mackenzie Rose to Carver.pdf; Evanston's Request for Inspection.pdf

Jim,

As you know, our expert was unable to get to Charleston on May 9 to inspect the tug due to his flight being canceled. Since then, we were given assurances the inspection would be rescheduled, but it never happened. As a result, he was unable to inspect it before our expert reports were due. Copies of the previous requests for inspection are attached for reference.

We still need an inspection of the tug and want to inspect it in the next two weeks. We will need at least three days' notice of the location where it can be inspected. Under the circumstances, to the extent that anything learned from the inspection bears on expert opinions, it will be included in our rebuttal reports. Please let me know if this is agreeable so we can work out a date for the inspection.

Thanks,
Jim

James L. Chapman, IV

CRENSHAW, WARE & MARTIN, P.L.C.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING as Owner and Operator of M/T
Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

**NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY'S
REQUEST FOR INSPECTION OF THE M/T MACKENZIE ROSE TO
COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING**

Claimant/Respondent Norfolk and Portsmouth Belt Line Railroad Company ("Belt Line"), by counsel, pursuant to Fed. R. Civ. P. Rule 34, requests of Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing, Inc., permission for the Belt Line and its attorneys, experts, surveyors, videographers, and/or photographers from, to inspect, test measure, survey, videotape, and photograph, the M/T MACKENZIE ROSE, its tackle, electronics, engines, equipment appurtenances.

Unless otherwise agreed by counsel, the inspection will be conducted at location in the vicinity of New York Harbor or Charleston Harbor, or such other location as agreed to by the parties, and on date to be agreed upon that is on or before May 16, 2025, commencing at 9:00 a.m. or such other time as agreed to by the parties.

If the requested inspection is not commenced, or not completed on that day, the conduct thereof will be adjourned from day to day, at the same time and place until completed.

Dated: April 30, 2025

NORFOLK AND PORTSMOUTH BELT
LINE RAILROAD COMPANY

By: 

James L. Chapman, IV, VSB No. 21983

W. Ryan Snow, VSB No. 47423

Mackenzie R. Pensyl, VSB No. 100012

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Line Railroad Company*

CERTIFICATE OF SERVICE

I certify that on this 30th day of April 2025, I served the foregoing by electronic mail on the following:

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Company*

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Railroad Company*



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING as Owner and Operator of M/T
Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

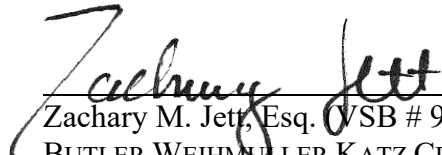
**EVANSTON INSURANCE COMPANY'S REQUEST FOR INSPECTION
OF THE M/T MACKENZIE ROSE TO COEYMANS MARINE TOWING, LLC
D/B/A CARVER MARINE TOWING**

Claimant/Respondent Evanston Insurance Company ("Evanston"), by counsel, pursuant to Fed. R. Civ. P. Rule 34, requests of Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing, Inc., permission for Evanston and its attorneys, experts, surveyors, videographers, and/or photographers from, to inspect, test measure, survey, videotape, and photograph, the M/T MACKENZIE ROSE, its tackle, electronics, engines, equipment appurtenances.

Unless otherwise agreed by counsel, the inspection will be conducted at location in the vicinity of New York Harbor or Charleston Harbor, or such other location as agreed to by the parties, and on date to be agreed upon that is on or before July 15, 2025, commencing at 9:00 a.m. or such other time as agreed to by the parties.

If the requested inspection is not commenced, or not completed on that day, the conduct thereof will be adjourned from day to day, at the same time and place until completed.

This 23rd day of June 2025.


Zachary M. Jett, Esq. (VSB # 93285)
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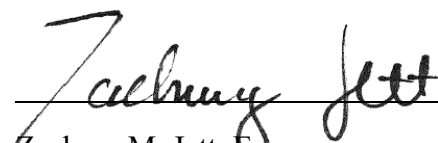
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*Attorneys for Intervening Plaintiff / Claimant
Evanston Insurance Company*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of June 2025 a true and correct copy of the forgoing *Evanston Insurance Company's Request for Inspection of the M/T Mackenzie Rose to Coeymans Marine Towsing, LLC d/b/a Carver Marine Towing* has been furnished to all counsel of record by electronic mail as follows:

<p>Harold L. Cohen, Esq. Clyde & Co US LLP 1221 Brickell Avenue, Suite 1600 Miami, Florida 33131 Harry.Cohen@Clydeco.us</p> <p>James H. Rodgers, Esq. Clyde & Co US LLP 405 Lexington Avenue New York, New York 10174 James.Rodgers@clydeco.us</p> <p>Michael J. Roman, Esq. Dawn L. Johnson, Esq. Clyde & Co US LLP 30 S. Whacker Drive, Suite 2600 Chicago, Illinois 60606 Michael.Roman@clydeco.us Dawn.Johnson@clydeco.us</p> <p>Rachel Werner, Esq. One North Central Avenue, Suite 1030 Phoenix, Arizona 85004 Rachel.Werner@clydeco.us</p> <p><i>Attorneys for Coeymans Marine Towing, LLC d/b/a Carver Marine Towing</i></p>	<p>James L. Chapman, IV, Esq. W. Ryan Snow, Esq. Mackenzie R. Pensyl, Esq. Crenshaw, Ware & Martin, P.L.C. 150 W. Main Street, Suite 1923 Norfolk, Virginia 23501 jchapman@cwm-law.com wrsnow@cwm-law.com mpensyl@cwm-law.com</p> <p><i>Attorneys for Norfolk and Portsmouth Belt Line Railroad Company</i></p>
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Zachary M. Jett, Esq.